

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Milwaukee Electric Tool Corporation)	
)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-4555
v.)	
)	Hon. Martha M. Pacold
The Individuals, et al.)	
)	
)	
)	
Defendants)	

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD

Defendants Vanon Direct, Mingsci Direct, THISS, JinWonNeng, coolsoul Direct, VANTTECH Direct, Exun Direct, Vinida Direct, Blandlighting, Tuoxin Direct, Dasnite Direct, Aimaya, Thiss US, Newbula, PDstation-US, Yangdock E-commerce, THISSENERGYSYSTEM Direct, AKKUCORE-US, FirstPower and Powerextra (hereinafter “Moving Defendants”), by and through counsel, and pursuant to Federal Rule of Civil Procedure Pursuant to FRCP 6(b)(1), respectfully move this Court for an extension of time to answer or otherwise plead, showing the Court as follows:

1. Plaintiff filed its Complaint in this matter on July 14, 2023. [ECF No. 1]
2. A summons was issued on August 11, 2023 and returned executed on August 14, 2023.
3. The deadline for parties to answer or otherwise plead is Friday, September 1, 2023.
4. On August 29, 2023, Defense counsel contacted Attorney William Kalbac, one of the attorneys for Plaintiff, via email and requested a 30-day extension of time for Moving

Defendants to answer or otherwise plead. Attorney Kalbac responded via email that day and indicated that Plaintiff has no objection to the requested extension.

5. The parties are currently engaged in good faith settlement discussions.
6. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
7. This extension will not unduly burden Plaintiff or any other party.

WHEREFORE, Defendants Vanon Direct, Mingsci Direct, THISS, JinWonNeng, coolsoul Direct, VANTTECH Direct, Exun Direct, Vinida Direct, Blandlighting, Tuoxin Direct, Dasnite Direct, Aimaya, Thiss US, Newbula, PDstation-US, Yangdock E-commerce, THISSENERGYSYSTEM Direct, AKKUCORE-US, FirstPower and Powerextra respectfully requests that this Court grant their Unopposed Motion for Extension of Time to Answer or Otherwise Plead and extending that deadline through Monday, October 2, 2023.

Respectfully submitted,

/s/ Erin K. Russell

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CERTIFICATE OF
SERVICE

This is to certify that on August 29, 2023, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell